

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

MAERSK LINE, LTD.,)	
)	
Judgment Creditor,)	
)	
v.)	Case No.: 18-MC-34-MJR
)	
NATIONAL AIR CARGO)	
GROUP, INC.,)	Judge:
)	
Judgment Debtor.)	
)	

PETITION TO REGISTER FOREIGN JUDGMENT

To the Clerk of the United States District Court for the Southern District of Illinois:

Judgment Creditor, Maersk Line, Ltd. (“Maersk”), by its attorneys, Dennis Minichello and William Ryan of Marwedel, Minichello & Reeb, P.C., requests registration in this District, pursuant to 28 U.S.C. § 1963. In support of its Petition, Maersk states as follows:

1. Maersk was the Plaintiff in a commercial arbitration against National Air Cargo Group, Inc. (“NACG”). Maersk moved for confirmation of the arbitration award in the matter captioned *MAERSK, INC. v. NATIONAL AIR CARGO GROUP, INC.*, Case No. 16 CIVIL 6272 in the United States District Court for the Southern District of New York (the “New York Court”).

2. On October 5, 2017, the New York Court entered a Judgment in favor of Maersk and against NACG, in the amount of \$935,942.24 plus post-judgment interest. A certified copy of the Judgment from the New York Court is attached hereto as Exhibit A.

3. NACG is a Florida corporation and maintains its principle place of business in Orlando, Florida. See Affidavit of Dennis Minichello, attached hereto as Exhibit B.

4. On information and belief, NACG is a party to several contracts with Transport Command, a division of the Department of Defense with a principal address at Scott Air Force Base in St. Clair County, Illinois.

4. On information and belief, NACG may have assets within the State of Illinois, and, specifically, within the Southern District of Illinois, with which the Judgment against it may be satisfied, in the form of monies due and owing NACG from Transport Command.

5. As of this date, NACG's right to appeal has been fully exhausted, and the Judgment remains unsatisfied. The Judgment of the district court remains in effect, outstanding and unmodified in the New York Court.

WHEREFORE, Judgment Creditor Maersk Line, Ltd. respectfully requests that the New York Court's Judgment be recorded and registered with this Court in Illinois, and recognized as a judgment entered and maintained by this Court, pursuant to 28 U.S.C. § 1963.

Respectfully submitted,

MAERSK LINE, LTD.

By: /s/ Dennis Minichello
One of Its Attorneys

Dennis Minichello (3122059)
William P. Ryan (6183496)
Marwedel, Minichello & Reeb, P.C.
303 W. Madison Street, Suite 1100
Chicago, IL 60606
Tel: (312) 902-1600
Email: dminichello@mmr-law.com
Email: bryan@mmr-law.com

CERTIFICATE OF SERVICE

I, Dennis Minichello, an attorney, certify that I served the attached Petition to Register Foreign Judgment on National Air Cargo Group, Inc., on:

Registered Agent for National Air Cargo Group, Inc.
Corporation Service Company
1201 Hays Street
Tallahassee, FL 32301-2525

via certified mail, return receipt requested, this 23rd day of May, 2018.

/s/ Dennis Minichello